



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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EDP:BET  
F. #2024R00934

271 Cadman Plaza East  
Brooklyn, New York 11201

May 7, 2025

By E-mail and ECF

Michael K. Schneider, Esq.  
Federal Defenders of New York  
One Pierrepont Plaza, 16th Floor  
Brooklyn, New York 11201

Re:     United States v. Svetlana Dali  
Criminal Docket No. 25-14 (AMD)

Dear Mr. Schneider:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The material will be available to you via USAfx. The government also requests reciprocal discovery from the defendant.

I.     The Government's Discovery

A.     Statements of the Defendant

- Reports from U.S. Customs and Border Protection (“CBP”) and Port Authority of New York and New Jersey (“Port Authority”) containing the defendant’s statements, bearing Bates numbers SD000092- SD000096.

B.     The Defendant’s Criminal History

- Defendant’s criminal history reports, bearing Bates numbers SD000097- SD000135.<sup>1</sup>

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<sup>1</sup> These reports supplement the criminal history reports that we produced in our first production dated March 6, 2025.

C. Documents and Tangible Objects

- Delta Air Lines, Inc. records, bearing Bates numbers SD000136-SD001338.
- Still images of video surveillance and layout map of Terminal 4 from John F. Kennedy International Airport Terminal LLC (“JKIAT”), bearing Bates numbers SD001339-SD001346.
- Surveillance videos and still images received from Port Authority, bearing Bates numbers SD001347-SD001371.

Very truly yours,

JOSEPH NOCELLA, JR.  
United States Attorney

By: /s/ Brooke Theodora  
Brooke Theodora  
Assistant U.S. Attorney  
(718) 254-6342

Enclosures

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)